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November 8, 2024

VIA ECF

Hon. John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1320
New York, NY 10007

Re: *United States v. Dalpour*, Case No. 1:24-cr-00264-JPC

Dear Judge Cronan:

We write on behalf of both parties in the above-captioned matter and pursuant to the Court's Individual Rule 1.E. to respectfully request an extension of the November 12, 2024 deadline to submit a joint letter proposing a schedule for the filing of pretrial motions as well as an adjournment of the status conference currently scheduled for December 3, 2024. This is the parties' third request for an extension of time to submit a joint letter proposing a schedule for the filing of pretrial motions and the status conference in this matter; the Court granted the parties' first request on July 12, 2024. (ECF No. 35.) and the second request on September 10, 2024 (ECF No. 41).

Discovery is not yet complete in this matter. Though the defense is making progress in reviewing the 675,000 pages of material the government produced on August 28, 2024, as of November 8 and since the last extension granted on September 10, the defense is still awaiting production of what is expected to be a significant volume of material. These include materials seized from Mr. Dalpour's office, the contents of the mobile phone seized from Mr. Dalpour, and information regarding the monetary amounts that appear in the Indictment. It is anticipated that review of such information will require a considerable amount of time once it is received, and that only following receipt and preliminary review of such information would the defense be in a position to have an informed conversation with the government regarding potential pre-trial motions or, for that matter, any potential disposition of this matter short of trial. Moreover, defense counsel will be taking a deposition on the date of the status conference currently scheduled for December 3, 2024.

For these reasons, the parties respectfully request (i) an adjournment – to January 28, 2025 – of the November 12, 2024 deadline to submit a joint letter proposing a schedule for the filing of

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pretrial motions in this matter, and (ii) a corresponding adjournment – to February 18, 2025 – of the status conference currently scheduled for December 3, 2024. The parties also agree to the government’s request for a concomitant exclusion of the time until a February 18, 2025, status conference under the Speedy Trial Act, as such an exclusion would serve the ends of justice. *See* 18 U.S.C. § 3161(h)(7)(A).

The parties have met and conferred regarding this joint request.

Respectfully submitted,

/s/ Jenny Kramer

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The request is granted. The deadline to submit a joint letter proposing a schedule for the filing of pretrial motions is January 28, 2025. The status conference scheduled for December 3, 2024, is rescheduled for February 18, 2025 at 10:00 a.m. The Court will exclude time until February 18, 2025 under the Speedy Trial Act to allow the defense to review discovery materials. The Court finds that the ends of justice served by that exclusion outweigh the best interest of the public and the Defendant in a speedy trial. See 18 U.S.C. § 3161(h)(7)(A).

SO ORDERED
November 11, 2024
New York, New York


JOHN P. CRONAN
United States District Judge